

**ADDENDUM NO. 3
TO THE
REPORT OF FIELD ACTIVITIES
FOR THE
PAINT SLUDGE REMOVAL PROGRAM
RINGWOOD MINES/LANDFILL SITE
RINGWOOD, NEW JERSEY**

November 1991

Prepared for

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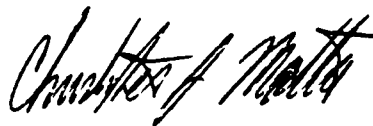
**ADDENDUM NO. 2
TO THE
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FOR THE
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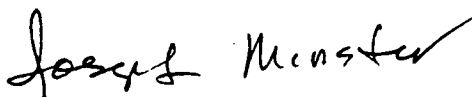
Geraghty & Miller, Inc. has prepared this addendum for Ford International Services, Inc. to document the field activities associated with the removal of buried drums and additional paint sludge discovered at the Ringwood Mines/Landfill Site. If you have any questions or comments concerning this addendum, please contact Christopher Motta of our office (201-909-0700).

Respectfully submitted,

GERAGHTY & MILLER, INC.



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200041

CONTENTS

	<u>Page</u>
INTRODUCTION	1
SCHEDULE	2
WASTE CHARACTERIZATION AND DISPOSAL	4
QUANTITIES	5

FIGURES

1. Location of Former Buried Drum Area and Additional Paint Sludge, Ringwood Mines/Landfill, Ringwood, New Jersey.

200042

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INTRODUCTION

This Addendum No. 2 to the "Report of Field Activities for the Paint Sludge Removal Program, Ringwood Mines/Landfill Site, Ringwood New Jersey" documents the field activities associated with the removal of buried drums and additional paint sludge discovered at the Ringwood Mines/Landfill Site. The original field activities report, dated September 1988, was transmitted to the U.S. Environmental Protection Agency (EPA) on September 8, 1988. The first addendum to that report, dated February 1989, was transmitted to the EPA on February 28, 1989. Field activities were conducted pursuant to Administrative Order II-CERCLA-70102, dated June 26, 1987, and the associated work plan.

The additional paint sludge was uncovered in the southern section of the O'Connor Disposal Area during earthwork construction unrelated to investigative or remedial activities conducted at the site. The construction work, which occurred during October 1989, included land clearing and regrading associated with the planned installation of three radio towers. The construction plan was approved by the Borough of Ringwood and was implemented by Wendell & Associates of New City, New York. The EPA, Ford International Services, Inc. (Services), and Woodward-Clyde Consultants (Services former environmental consultant) were not aware of the construction plans at that time.

Woodward-Clyde Consultants (WCC), at the request of the EPA and on behalf of Services, prepared a letter work plan for the additional paint sludge removal activities. The letter work plan, dated December 20, 1989, was transmitted to Mr. Howard Orlean of the EPA.

200043

During excavation of the additional paint sludge, buried drums were discovered. EPA requested Services to address the drums by submittal and implementation of a "supplemental work plan." WCC submitted a supplemental letter work plan, dated May 1, 1990, to Mr. Raymond Basso of the EPA.

Pro-Chem Mechanical Contractors, Inc. of Belleville, New Jersey (Pro-Chem) was the prime contractor for the excavation of the buried drums and additional paint sludge. As prime contractor, Pro-Chem provided personnel and equipment to complete the work. Pat Perretti Freight Services, Inc. of Hopatcong, New Jersey (Perretti), under contract with Pro-Chem, transported the additional paint sludge. Safety-Kleen Corp of Elgin, Illinois (Safety-Kleen) and Chemical Waste Management, Inc. of Newark, New Jersey (CWM) provided waste characterization, transportation, and disposal services for the materials associated with the buried drums. WCC provided resident engineering services on behalf of Services.

The additional paint sludge occurred at the approximate location depicted on Figure 1. The area of the buried drums also is depicted on Figure 1. Two post-excavation soil samples that were planned to be collected as part of the removal of the additional paint sludge were not collected. EPA was made aware that the post-excavation surface was not conducive to sampling because of the abundant presence of mine tailings, and organic and other debris.

SCHEDULE

This section chronologically documents the field activities that occurred during the removal of the buried drums and the additional paint sludge. The field effort began in January 1990 and was completed in July 1991.

A summary of activities is presented below:

200044

January 1990	Began excavating the additional paint sludge and discovered buried drums. Field operations were temporarily suspended.
February 1990	No significant on-site activities occurred.
March 1990	No significant on-site activities occurred.
April 1990	Continued excavating the additional paint sludge and discovered additional buried drums. Field operations were temporarily suspended. At the request of the EPA, a work plan that addressed drum removal was prepared.
May 1990	Excavation and hauling of additional paint sludge for off-site disposal; excavation, transfer, and staging of drums; and waste characterization drum sampling of liquid materials by Safety-Kleen.
June 1990	No significant on-site activities occurred.
July 1990	No significant on-site activities occurred.
August 1990	Removal and off-site disposal of drummed liquid materials by Safety-Kleen. Waste characterization drum sampling by CWM occurred.
September 1990	No significant on-site activities occurred.
October 1990	No significant on-site activities occurred.
November 1990	No significant on-site activities occurred.

200045

December 1990	No significant on-site activities occurred.
January 1990	No significant on-site activities occurred.
February 1990	Bac Tech Environmental of Milltown, New Jersey, under the supervision of CWM personnel, prepared the drums scheduled for removal and off-site disposal by CWM. The preparation included consolidation, compaction, and "overpacking" the excavated drums previously staged in roll-off containers. Drums containing waste with no free liquids were "overpacked" into palletized boxes.
March 1990	Drums and palletized boxes were inspected and the plastic cover over them was replaced/repared as necessary.
April 1990	Staged drums and palletized boxes were inspected.
May 1990	Staged drums and palletized boxes were inspected.
June 1990	CWM initiated the removal of the drums and palletized boxes for off-site disposal.
July 1990	CWM completed the removal of the drums and palletized boxes for off-site disposal.

WASTE CHARACTERIZATION AND DISPOSAL

Materials encountered in the buried drums were sampled and analyzed for waste characterization by Safety-Kleen and CWM. The waste characterization analytical data reports were submitted to the EPA as an attachment to the response letter, dated May 6,

200046

1991, from WCC to Mr. Raymond Basso of the EPA. Waste streams characterized by Safety-Kleen were either fuels blended at its Linden, New Jersey facility or incinerated at its New Castle, Kentucky facility. Waste streams characterized by CWM were either incinerated or landfilled at CWM facilities. Consistent with the prior disposal of paint sludge, the additional paint sludge was landfilled at the Wayne Disposal Inc. facility in Belleville, Michigan.

QUANTITIES

A total of approximately 727 tons of additional paint sludge was excavated and transported from the site by Pro-Chem and Perretti. Safety-Kleen disposed of thirteen 55-gallon collection drums of liquid waste that had been transferred from buried drums, and three 55-gallon drums of solid waste (primarily earthen sorbent material with some sorbent pads and soil). CWM disposed of four 55-gallon drums of liquid waste that had been transferred from buried drums, three drums of collected decontamination water and residual water from the roll-off containers, seventeen 1 cubic yard palletized boxes containing excavated drums and their contents, and three drums containing residual materials associated with the cleanup of the area.

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